

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UBS AG, LONDON BRANCH,

Plaintiff,

Counterclaim-Defendant

- against -

GREKA INTEGRATED, INC.,

Defendant,

Counterclaim-Plaintiff.

) **Civil Action No. 19 Civ. 10786 (LLS)**
) **(KNF)**
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**DECLARATION OF PETER E. CALAMARI IN SUPPORT OF MOTION OF QUINN
EMANUEL URQUHART & SULLIVAN LLP TO WITHDRAW AS COUNSEL OF
RECORD FOR GREKA INTEGRATED, INC. AND FOR A STAY OF PROCEEDINGS
FOR THIRTY DAYS**

I, PETER E. CALAMARI, hereby declare, under penalty of perjury, that the following is true:

1. I am a partner at the firm Quinn Emanuel Urquhart & Sullivan LLC (“Quinn Emanuel” or “Counsel”), a member in good standing of the bar of the state of New York, and counsel to Defendant, Counterclaim-Plaintiff Greka Integrated, Inc. (“GIT”) in this action.

2. I submit this declaration in support of Quinn Emanuel’s Motion to Withdraw as Counsel of Record for GIT and for a Stay of Proceedings for Thirty Days (the “Motion”).

3. Professional considerations that fall under the list of reasons to withdraw enumerated in New York Rules of Professional Conduct Rule 1.16 (b) and (c) (*Declining or Terminating Representation*) require the termination of Quinn Emanuel’s representation of GIT. Requiring Counsel to provide further information may require the disclosure of Confidential Information, as defined under New York Rules of Professional Conduct Rule 1.6.


4. Counsel is also requesting that the Court grant an order for a stay of all proceedings for a period of thirty (30) days to enable GIT to obtain new counsel. That period of time is necessary in order to enable GIT to find new counsel.

5. No discovery has occurred in the action, and no other motions are pending before the Court in this action.

6. GIT is aware of and consents to the requests in the Motion.

7. Quinn Emanuel is not seeking a retaining or charging lien in the action.

DATED: July 14, 2020
New York

By 

Peter E. Calamari

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2020, I caused a true and correct copy of the Declaration of Peter E. Calamari in Support of Quinn Emanuel Urquhart & Sullivan LLC's Motion to Withdraw as Counsel of Record and for a Stay of Proceedings for Thirty Days to be served by electronic means on Defendant, Counterclaim-Plaintiff Greka Integrated, Inc. and counsel to all other parties in Civil Case No. 19 Civ. 10786 (LLS) (KNF).

QUINN EMANUEL URQUHART & SULLIVAN, LLP

A handwritten signature in cursive script, appearing to read "Peter E. Calamari", written in dark ink.

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